

Exhibit 1

June 1, 2014

BY E-MAIL

John B. Bellinger, III
Arnold & Porter LLP
555 Twelfth Street, N.W.
Washington, D.C. 20004

Dear John:

I am writing to protest in the strongest possible terms the recent actions taken by your client, the Government of Israel, apparently at the urging of the Bank of China, Ltd. and the People's Republic of China, to obstruct the limited, voluntary testimony of Uzi Shaya in *Wultz v. Bank of China Ltd.*, No. 1:11-cv-01266 (S.D.N.Y) (SAS).

As you know, Mr. Shaya, who has been a private citizen for approximately seven years, was scheduled to meet with me tomorrow to discuss the logistics of his deposition, as described in my letter dated April 18, 2014, a copy of which you have. As the April 18 letter makes clear, and as you and I discussed by telephone on Tuesday, May 27, 2014, Mr. Shaya's voluntary testimony will be limited to periods and events post-dating his government service, when he was a private citizen, pending the outcome of legal proceedings that could impact his broader testimony. Israel has no basis upon which to object to such a limited-scope deposition, and you offered none when we spoke.

Notwithstanding all of the above, we understand that Mr. Shaya was summoned for questioning by the YAHBAL, or serious international crimes investigative unit of the Israeli police (מִלְחָמָה 443), on Thursday, May 29, 2014. We also understand that at that meeting, the Israeli police told Mr. Shaya that he would be arrested if he met with me tomorrow, or attempted to do so, even though the purpose of our meeting was to discuss matters relating solely to his status as a private citizen. As a result, Mr. Shaya, fearing incarceration, cancelled our meeting.

This is not the first time that your client has threatened Mr. Shaya, but it is the first time your client has threatened him concerning matters that relate solely to his status as a private citizen. The actions taken by your client are improper and without any basis in U.S. or Israeli law.

We ask that you confirm in writing by the end of the day tomorrow that your client will stop harassing Mr. Shaya and tampering with an important witness in U.S. court proceedings.

We reserve all rights to seek appropriate forms of judicial relief, in both the United States and in Israel, against both your client and the defendant in this matter, the Bank of China, Ltd.

Sincerely,

/s/

Lee Wolosky

cc: U.S. Ambassador to Israel Dan Shapiro (via e-mail)